

6. The above – described vehicle is encumbered by a lien with a payoff in the amount of \$25,331.52 plus other appropriate charges as of July 28, 2024 but subject to change. The regular monthly payment is \$623.16 at an interest rate of 19.87%.

7. Applying payments received to the earliest payment due, payments have been missed post-petition, since March 18, 2024 in the amount of \$3,115.80, plus all applicable late charges, interest, attorneys' fees and costs plus Pre-Petition Payments of \$1,869.48.

8. The Property has a N.A.D.A. Value of \$20,850.00.

9. The vehicle is not necessary to an effective reorganization.

10. The Movant is the only lienholder of record with regard to the vehicle.

11. Failure to make adequate protection payments is cause for relief from the automatic stay.

12. The Movant has incurred attorney's fees in the filing of this Motion.

13. The vehicle is a rapidly depreciating asset. Movant requests the waiver of Rule 4001(a)(3).

WHEREFORE, Movant prays for your Honorable Court to enter an Order permitting the Movant to proceed with the repossession proceedings of the aforementioned vehicle.

Respectfully submitted,
Lavin, Cedrone, Graver, Boyd & DiSipio

/s/ Regina Cohen
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